

MAY - 8 2019

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

LINDA NICOLE MORENO

AARON ORTIZ

ENRIQUE SANCHEZ-RODRIGUEZ

DAVID GIL

JOSHUA LEE DELEON

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Criminal No. M-18-1893-S3

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about August 2018 to on or about October 25, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

LINDA NICOLE MORENO
AARON ORTIZ
ENRIQUE SANCHEZ-RODRIGUEZ
and
JOSHUA LEE DELEON

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Two

On or about October 25, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**LINDA NICOLE MORENO
and
AARON ORTIZ**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 4 kilograms of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Three

On or about October 25, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

AARON ORTIZ

having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, in the Southern District of Texas, McAllen Division, on January 28, 2009, in cause number 7:07cr854-S1-002 for Conspiracy to Carjack, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, namely, a Raven Arms, Model MP-25, .25 Auto caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Count Four

On or about September 11, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

LINDA MORENO

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 549 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Five

On or about October 23, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**LINDA NICOLE MORENO
AARON ORTIZ
and
ENRIQUE SANCHEZ-RODRIGUEZ**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 986 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Six

From on or about October 2018 to on or about December 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ENRIQUE SANCHEZ-RODRIGUEZ

and

DAVID GIL

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Seven

On or about December 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ENRIQUE SANCHEZ-RODRIGUEZ

and

DAVID GIL

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 900 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

Count Eight

From on or about September 15, 2018 to on or about September 17, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

LINDA NICOLE MORENO

and

JOSHUA LEE DELEON

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 50 grams or more, that is, approximately 462 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

Count Nine

On or about April 10, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSHUA LEE DELEON

having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, in the 156th District Court of Live Oak County, Texas, on April 8, 2015, in cause number L-14-0089-CR-B for Felon in Possession of Firearm, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, namely, a Glock, Model 22, .40 caliber pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

18 U.S.C. §924(d)(1) and 28 U.S.C. § 2461(c)

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants,

**AARON ORTIZ
and
JOSHUA LEE DELEON**

that upon conviction of a violation of Title 18, United States Code, Section 922(g)(1), all firearms or ammunition involved in said violation(s) are subject to forfeiture, including but not limited to the following:

Raven Arms, Model MP-25, .25 Auto caliber pistol, Serial number 1749906

Fifty-three (53) rounds of assorted ammunition

Glock, Model 22, .40 caliber pistol, Serial number NHR217

One (1) round of Winchester, .40 S&W in caliber ammunition

One (1) round of Tulammo, .40 S&W in caliber ammunition

Four (4) rounds of Federal, .40 S&W in caliber ammunition

Seven (7) rounds of Winchester, .40 S&W in caliber ammunition

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY